

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

DEFENDANT BIJAN RAFIEKIAN’S MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant, through counsel and for the reasons set forth in the accompanying non-confidential supporting memorandum, respectfully moves the Court to issue an order granting leave to file an unredacted copy of the Motion to Dismiss the Indictment and Exclude and Suppress Privileged Information and certain supporting exhibits under seal. Pursuant to Local Criminal Rule 49(D), Defendants are filing this motion with a non-confidential supporting memorandum and non-confidential proposed order.

Dated: May 28, 2019

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that, on the 28th day of May 2019, true and genuine copies of Defendant Rafiekian's Motion for Leave to File Under Seal were sent via electronic mail by the Court's CM/ECF system to the following:

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